



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
CONFIDENTIAL

2018 OCT 30 AM 9:00

SENSITIVE

October 29, 2018

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP by MAF*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: *KDR* *BH*
Kristin D. Roser/Ben Holly
Reports Analysis Division
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2018 September Monthly Report for
the Administrative Fine Program

Attached is the name of a political committee and its treasurer who failed to file the 2018 September Monthly Report in accordance with 52 U.S.C. § 30104(a). The September Monthly Report was due on September 20, 2018.

The committee listed on the attached RTB Circulation Report failed to file the report. In accordance with the schedule of civil money penalties for reports at 11 CFR 111.43, the committee should be assessed the civil money penalty highlighted on the attached circulation report.

Recommendation

1. Find reason to believe that the political committee and its treasurer, in his official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report.
2. Send the appropriate letter.

10/29/2018 12:16 PM

Federal Election Commission
Reason to Believe Circulation Report
2018 SEPTEMBER MONTHLY Not Election Sensitive 09/20/2018 P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3489	C00147231	CROWLEY MARITIME CORPORATION FEDERAL PAC		DANIEL L. WARNER	\$326,039	0		Not Filed	\$17,160 (est)	\$667

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2018)
September Monthly Report for the)
Administrative Fine Program:)
CROWLEY MARITIME CORPORATION) AF# 3489
FEDERAL PAC, and WARNER, DANIEL)
L. MR. as treasurer;)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission,
do hereby certify that on November 06, 2018 the Commission took the following
actions on the Reason To Believe Recommendation - 2018 September Monthly
Report for the Administrative Fine Program as recommended in the Reports Analysis
Division's Memorandum dated October 29, 2018, on the following committee:

AF#3489 Decided by a vote of 4-0 to: (1) find reason to believe that CROWLEY
MARITIME CORPORATION FEDERAL PAC, and WARNER, DANIEL L. MR. in his
official capacity as treasurer, violated 52 U.S.C. 30104(a) and make a preliminary
determination that the civil money penalty would be the amount indicated on the report;
(2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub
voted affirmatively for the decision.

Attest:

November 6, 2018
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 6, 2018

Daniel L. Warner, in official capacity as Treasurer
Crowley Maritime Corporation Federal PAC
9487 Regency Square Blvd.
Jacksonville, FL 32225

C00147231
AF#: 3489

Dear Mr. Warner:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a September Monthly Report of Receipts and Disbursements covering the period August 1, 2018 through August 31, 2018. This report shall be filed no later than September 20, 2018. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On November 6, 2018, the FEC found that there is reason to believe ("RTB") that Crowley Maritime Corporation Federal PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before September 20, 2018. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$667. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$667 is due within forty (40) days of the finding, or by December 16, 2018, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$17,160
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or December 16, 2018. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Crowley Maritime Corporation Federal PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Carole C. Hunter

Caroline C. Hunter
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$667 for the 2018 September Monthly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Crowley Maritime Corporation Federal PAC

FEC ID#: C00147231

AF#: 3489

PAYMENT DUE DATE: December 16, 2018

PAYMENT AMOUNT DUE: \$667

December 12, 2018

Rhiannon R. Magruder
Office of Administrative Review
Federal Elections Commission
1050 First Street, NE
Washington, DC 20002

Re: AF# 3489

Dear Ms. Magruder:

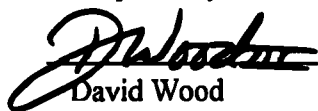
Crowley Maritime Corporation Federal PAC ("Crowley PAC") is in receipt of your letter dated November 6, 2018 in reference to AF# 3489. Crowley PAC wishes to challenge the civil money penalty.

Crowley PAC strives to comply with all Federal Election Commission regulations at all times. We do not deny that the September Monthly Report of Receipts and Disbursements was filed late. The late filing was due to our recent transition to new report filing software and a loss of data experience during the transition. All efforts were made to recover the data and when those proved futile, we undertook the effort of "rebuilding" the database of the PAC's receipts and disbursements based on previously completed monthly reports. Such efforts prevented the accurate compilation of information required to file the monthly report. Despite the lack of timely report filing, the PAC continued proper operation and recordkeeping to ensure proper reporting once all the data reentry was complete. Once the data reentry was completed and all information was current, the late report was filed on November 5, 2018.

Crowley PAC understands the severity of the violation and the need for political action committees to report their activities. The violation related to the Crowley PAC was the result of extenuating and unforeseen events. We have acted in good faith in managing the PAC at all times. Additionally, per your letter, there have not been any previous civil money penalties assessed on the PAC. We believe a penalty of \$667 is excessive and respectfully requests reconsideration and mitigation of the penalty amount.

Once again, thank you for your time and consideration. If there are any questions regarding the above explanation, please do not hesitate to contact me
david.wood@crowley.com

Respectfully,



David Wood
Government Relations Associate



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 2019

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 3489, AF# 3547, and AF# 3552 – Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer (C00147231)

Summary of Recommendations

Make a final determination in AF# 3489 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667.

Make a final determination in AF# 3547 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$1,866.

Make a final determination in AF# 3552 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800.

Reason-to-Believe Background

The 2018 September Monthly was due on September 20, 2018. The Committee filed the report on November 5, 2018, 46 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). On November 6, 2018, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to file the 2018 September Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$667 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated November 6, 2018 was mailed to the respondents' address of record by the Reports Analysis Division ("RAD") to notify them of the Commission's RTB finding and civil money penalty.

The 2018 October Monthly Report was due on October 20, 2018. The Committee filed the report on November 5, 2018, 16 days late. The report is election sensitive and was not filed prior to four days before the general election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). On December 7, 2018, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to file the 2018 October Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated December 7, 2018 was mailed to the respondents' address of record by RAD to notify them of the Commission's RTB finding and civil money penalty.

The respondents conclude by stating they believe the penalties are excessive and request the Commission's reconsideration.

Analysis

The Committee explains that it lost its financial data when transitioning to a new filing software. They were forced to rebuild their database, which delayed the filing of the 2018 September Monthly, October Monthly, and Pre-General Reports until November 5, 2018. There are no Commission records that indicate the respondents contacted Commission staff for assistance in rebuilding their data file.

While the Reviewing Officer recognizes the data loss was unexpected, failure of committee computers and/or software is included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. In addition, a committee's history of compliance is not considered when determining if a violation occurred. Therefore, the Reviewing Officer recommends that the Commission make a final determination in AF# 3489, AF# 3547, and AF# 3552 that the respondents violated 52 U.S.C. § 30104(a).

At the time of RTB in AF# 3489, the Commission used an estimated level of activity (\$17,160) to calculate the penalty because the 2018 September Monthly Report had not yet been filed. 11 C.F.R. § 111.43(d)(2)(ii). The Committee filed the report on November 5, 2018, 46 days late. The report is not election sensitive and was not filed within 30 days; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). The report discloses \$11,187 in total receipts and \$60 in total disbursements. Therefore, the actual level of activity of the 2018 September Monthly Report is \$11,247. Using the schedule of penalties for not filed non-election sensitive reports at 11 C.F.R. § 111.43(a) and for the level of activity bracket of \$10,000 - \$24,999.99, the civil money penalty is $\$667 \times [1 + (.25 \times 0 \text{ previous violations})]$ or \$667. Therefore, the Reviewing Officer confirms the civil money penalty assessed at RTB is correct and recommends that the Commission assess a \$667 civil money penalty.

At the time of RTB in AF# 3547, the Commission used the actual level of activity (\$28,334) to calculate the penalty because the 2018 October Monthly Report had already been filed. 11 C.F.R. § 111.43(d)(3). The Committee filed the report on November 5, 2018, 16 days late. The report is election sensitive and was not filed prior to four days before the general election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). The report discloses \$8,780 in total receipts and \$19,555 in total disbursements. Therefore, the actual level of activity of the 2018 October Monthly Report is \$28,334. Using the schedule of penalties for not filed election sensitive reports at 11 C.F.R. § 111.43(b) and for the level of activity bracket of \$25,000 - \$49,999.99, the civil money penalty is $\$1,866 \times [1 + (.25 \times 0 \text{ previous violations})]$ or \$1,866. Therefore, the Reviewing Officer confirms the civil money penalty assessed at RTB is correct and recommends that the Commission assess a \$1,866 civil money penalty.

At the time of RTB in AF# 3552, the Commission used the actual level of activity (\$9,060) to calculate the penalty because the 2018 Pre-General Report had already been filed. 11 C.F.R. § 111.43(d)(3). The Committee filed the report on November 5, 2018, 11 days late. The report is election sensitive and was not filed prior to four days before the general election;

therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). The report discloses \$0 in total receipts and \$9,060 in total disbursements. Therefore, the actual level of activity of the 2018 October Monthly Report is \$9,060. Using the schedule of penalties for not filed election sensitive reports at 11 C.F.R. § 111.43(b) and for the level of activity bracket of \$5,000 - \$9,999.99, the civil money penalty is $\$800 \times [1 + (.25 \times 0 \text{ previous violations})]$ or \$800. Therefore, the Reviewing Officer confirms the civil money penalty assessed at RTB is correct and recommends that the Commission assess an \$800 civil money penalty.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 3489 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 3489 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667;
- (3) Adopt the Reviewing Officer recommendation for AF# 3547 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (4) Make a final determination in AF# 3547 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$1,866;
- (5) Adopt the Reviewing Officer recommendation for AF# 3552 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (6) Make a final determination in AF# 3552 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800; and
- (7) Send the appropriate letters.

Attachments

Attachment 1 –
Attachment 2 –
Attachment 3 –
Attachment 4 –

Attachment 5 – Declaration from RAD	for AF# 3489
Attachment 6 – Declaration from RAD	for AF# 3547
Attachment 7 – Declaration from RAD	for AF# 3552
Attachment 8 – Declaration from OAR	

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Crowley Maritime Corporation Federal PAC:
 - A) Non-Filer Letter, dated October 9, 2018, referencing the 2018 September Monthly Report (sent via electronic mail to: daiquiri.fennel@crowley.com);
 - B) Reason-to-Believe Letter, dated November 6, 2018, referencing the 2018 September Monthly Report (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find that Crowley Maritime Corporation Federal PAC filed the 2018 September Monthly Report with the Commission on November 5, 2018.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 30th day of January, 2019.

Kristin Roser

Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

October 9, 2018

WARNER, DANIEL L. MR., TREASURER
CROWLEY MARITIME CORPORATION FEDERAL PAC
9487 REGENCY SQUARE BLVD.
JACKSONVILLE, FL 32225

IDENTIFICATION NUMBER: C00147231

REFERENCE: SEPTEMBER MONTHLY REPORT (08/01/2018 - 08/31/2018)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Jamie Sikorsky in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1137.

CROWLEY MARITIME CORPORATION FEDERAL PAC

Page 2 of 2

Sincerely,

Debbie Chacona

Deborah Chacona
Assistant Staff Director
Reports Analysis Division

250

1103090300021262

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Crowley Maritime Corporation Federal PAC:
 - A) Non-Filer Letter, dated November 5, 2018, referencing the 2018 October Monthly Report (sent via electronic mail to: daiquiri.fennel@crowley.com);
 - B) Reason-to-Believe Letter, dated December 7, 2018, referencing the 2018 October Monthly Report (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find that Crowley Maritime Corporation Federal PAC filed the 2018 October Monthly Report with the Commission on November 5, 2018.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 13th day of February, 2019.

Ben Holly for KDR

Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 5, 2018

WARNER, DANIEL L. MR., TREASURER
CROWLEY MARITIME CORPORATION FEDERAL PAC
9487 REGENCY SQUARE BLVD.
JACKSONVILLE, FL 32225

IDENTIFICATION NUMBER: C00147231

REFERENCE: OCTOBER MONTHLY REPORT (09/01/2018 - 09/30/2018)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Jamie Sikorsky in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1137.

Page 2 of 2

Debbie Chacona

Deborah Chacona
Assistant Staff Director
Reports Analysis Division

250

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Crowley Maritime Corporation Federal PAC:
 - A) Reason-to-Believe Letter, dated December 13, 2018, referencing the 2018 12 Day Pre-General Report (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find that Crowley Maritime Corporation Federal PAC filed the 2018 12 Day Pre-General Report with the Commission on November 5, 2018.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 13th day of February, 2019.

Ben Holly for KDR

Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A political committee not authorized by a candidate which is filing on a Monthly basis in an election year shall file a September Monthly Report by September 20, an October Monthly Report by October 20, and a Pre-General Report no later than the 12th day before the general election. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on September 20, 2018 for the 2018 September Monthly Report to be timely filed, October 20, 2018 for the October Monthly Report to be timely filed, and October 25, 2018 for the 2018 Pre-General Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Cover, Summary Page, and Detailed Summary Pages of the 2018 September Monthly Report filed by Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, on November 5, 2018.
 - b) Cover, Summary Page, and Detailed Summary Pages of the 2018 October Monthly Report filed by Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, on November 5, 2018.
 - c) Cover, Summary Page, and Detailed Summary Pages of the 2018 Pre-General Report filed by Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, on November 5, 2018.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 14th day of February, 2019.

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

Crowley Maritime Corporation Federal PAC

ADDRESS (number and street)

9487 Regency Square Blvd

☐ Check if different than previously reported. (ACC)

Jacksonville

FL

32225

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C00147231

3. IS THIS
REPORT☒NEW
(N)

OR

☐AMENDED
(A)4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

- ☐ April 15
Quarterly Report (Q1)
- ☐ July 15
Quarterly Report (Q2)
- ☐ October 15
Quarterly Report (Q3)
- ☐ January 31
Year-End Report (YE)
- ☐ July 31 Mid-Year
Report (Non-election
Year Only) (MY)
- ☐ Termination Report
(TER)

(b) Monthly
Report
Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)
(Non-Election Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☒ Sep 20 (M9) ☐ Dec 20 (M12)
(Non-Election Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

MM / DD / YYYY

in the
State of(d) 30-Day
POST-Election
Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

MM / DD / YYYY

in the
State of

5. Covering Period

MM / DD / YYYY
08 / 01 / 2018

through

MM / DD / YYYY
08 / 31 / 2018

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Mead, Arthur, Mr.,

Type or Print Name of Treasurer

Signature of Treasurer

Mead, Arthur, Mr.,

[Electronically Filed]

Date

MM / DD / YYYY
10 / 29 / 2018

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only**FEC FORM 3X**
Rev. 05/2016

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

Crowley Maritime Corporation Federal PAC

Report Covering the Period:

From:

M	M	/	D	D	/	V	V	V	V	V	V
0	8		0	1		2	0	1	8		

To:

M	M	/	D	D	/	V	V	V	V	V	V
0	8		3	1		2	0	1	8		

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2018		89422.71
(b) Cash on Hand at Beginning of Reporting Period.....	71455.73	
(c) Total Receipts (from Line 19)	11187.00	77512.58
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	82642.73	166935.29
7. Total Disbursements (from Line 31)	59.89	84352.45
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	82582.84	82582.84
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

Crowley Maritime Corporation Federal PAC

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y	Y	Y
0	8		0	1		2	0	1	8		

To:

M	M	/	D	D	/	Y	Y	Y	Y	Y	Y
0	8		3	1		2	0	1	8		

I. Receipts
COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date
11. Contributions (other than loans) From:
 (a) Individuals/Persons Other
Than Political Committees

(i) Itemized (use Schedule A).....

8216.00

62077.94

(ii) Unitemized

471.00

12934.64

(iii) TOTAL (add

Lines 11(a)(i) and (ii).....▶

8687.00

75012.58

(b) Political Party Committees

0.00

0.00

(c) Other Political Committees
(such as PACs).....

0.00

0.00

(d) Total Contributions (add Lines

11(a)(iii), (b), and (c)) (Carry

Totals to Line 33, page 5).....▶

8687.00

75012.58

**12. Transfers From Affiliated/Other
Party Committees.....**

0.00

0.00

13. All Loans Received

0.00

0.00

14. Loan Repayments Received.....

0.00

0.00

**15. Offsets To Operating Expenditures
(Refunds, Rebates, etc.)**

(Carry Totals to Line 37, page 5).....

0.00

0.00

**16. Refunds of Contributions Made
to Federal Candidates and Other
Political Committees.....**

2500.00

2500.00

17. Other Federal Receipts

(Dividends, Interest, etc.).....

0.00

0.00

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3).....

0.00

0.00

(b) Levin Funds (from Schedule H5).....

0.00

0.00

(c) Total Transfers (add 18(a) and 18(b))..

0.00

0.00

19. Total Receipts (add Lines 11(d),

12, 13, 14, 15, 16, 17, and 18(c)).....▶

11187.00

77512.58

20. Total Federal Receipts

(subtract Line 18(c) from Line 19).....▶

11187.00

77512.58

11059133597737

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share	0.00	0.00
(b) Other Federal Operating Expenditures	59.89	585.53
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	59.89	585.53
22. Transfers to Affiliated/Other Party Committees	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees	0.00	83766.92
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F)	0.00	0.00
26. Loan Repayments Made	0.00	0.00
27. Loans Made	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations)	0.00	0.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	59.89	84352.45
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)	59.89	84352.45

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	8687.00	75012.58
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	8687.00	75012.58
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	59.89	585.53
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	59.89	585.53

**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

Crowley Maritime Corporation Federal PAC

ADDRESS (number and street)

9487 Regency Square Blvd

Check if different than previously reported. (ACC)

Jacksonville

FL

32225

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00147231

3. IS THIS
REPORT☒NEW
(N)

OR

☐AMENDED
(A)4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

- ☐ April 15
Quarterly Report (Q1)
- ☐ July 15
Quarterly Report (Q2)
- ☐ October 15
Quarterly Report (Q3)
- ☐ January 31
Year-End Report (YE)
- ☐ July 31 Mid-Year
Report (Non-election
Year Only) (MY)
- ☐ Termination Report
(TER)

(b) Monthly
Report
Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)
(Non-Election Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)
(Non-Election Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☒ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

M M / D D / Y Y Y Y Y Y

in the
State of(d) 30-Day
POST-Election
Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

M M / D D / Y Y Y Y Y Y

in the
State of

5. Covering Period

M M / D D / Y Y Y Y Y Y
09 / 01 / 2018

through

M M / D D / Y Y Y Y Y Y
09 / 30 / 2018

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Mead, Arthur, Mr.,

Type or Print Name of Treasurer

Signature of Treasurer

Mead, Arthur, Mr.,

[Electronically Filed]

Date

M M / D D / Y Y Y Y Y Y
10 / 29 / 2018

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only**FEC FORM 3X**
Rev. 05/2016

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

Crowley Maritime Corporation Federal PAC

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y
09			01			2018			

To:

M	M	/	D	D	/	Y	Y	Y	Y
09			30			2018			

	COLUMN A This Period	COLUMN B Calendar Year-to-Date								
6. (a) Cash on Hand January 1, <table><tr><td>Y</td><td>Y</td><td>Y</td><td>Y</td></tr><tr><td>2018</td><td></td><td></td><td></td></tr></table>	Y	Y	Y	Y	2018					89422.71
Y	Y	Y	Y							
2018										
(b) Cash on Hand at Beginning of Reporting Period.....	82582.84									
(c) Total Receipts (from Line 19).....	8779.50	86292.08								
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	91362.34	175714.79								
7. Total Disbursements (from Line 31).....	19555.05	103907.50								
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	71807.29	71807.29								
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00									
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00									



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 05/2018)

Page 3

Write or Type Committee Name

Crowley Maritime Corporation Federal PAC

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y
0	9		0	1		2	0	1	8

To:

M	M	/	D	D	/	Y	Y	Y	Y
0	9		3	0		2	0	1	8

I. Receipts
COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A).....

8391.00

70468.94

(ii) Unitemized

388.50

13323.14

(iii) TOTAL (add

Lines 11(a)(i) and (ii).....▶

8779.50

83792.08

(b) Political Party Committees

0.00

0.00

(c) Other Political Committees (such as PACs).....

0.00

0.00

(d) Total Contributions (add Lines

11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶

8779.50

83792.08

12. Transfers From Affiliated/Other

Party Committees.....

0.00

0.00

13. All Loans Received

0.00

0.00

14. Loan Repayments Received.....

0.00

0.00

15. Offsets To Operating Expenditures

(Refunds, Rebates, etc.)

(Carry Totals to Line 37, page 5).....

0.00

0.00

16. Refunds of Contributions Made

to Federal Candidates and Other Political Committees

0.00

2500.00

17. Other Federal Receipts

(Dividends, Interest, etc.).....

0.00

0.00

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3).....

0.00

0.00

(b) Levin Funds (from Schedule H5)

0.00

0.00

(c) Total Transfers (add 18(a) and 18(b))..

0.00

0.00

19. Total Receipts (add Lines 11(d),

12, 13, 14, 15, 16, 17, and 18(c)).....▶

8779.50

86292.08

20. Total Federal Receipts

(subtract Line 18(c) from Line 19).....▶

8779.50

86292.08

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	8779.50	83792.08
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	8779.50	83792.08
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	55.05	640.58
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	55.05	640.58

**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

Crowley Maritime Corporation Federal PAC

ADDRESS (number and street)

9487 Regency Square Blvd

☐ Check if different than previously reported. (ACC)

Jacksonville

FL

32225

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00147231

3. IS THIS
REPORT☒NEW
(N)

OR

☐AMENDED
(A)4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

- ☐ April 15
Quarterly Report (Q1)
- ☐ July 15
Quarterly Report (Q2)
- ☐ October 15
Quarterly Report (Q3)
- ☐ January 31
Year-End Report (YE)
- ☐ July 31 Mid-Year
Report (Non-election
Year Only) (MY)
- ☐ Termination Report
(TER)

(b) Monthly
Report
Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)
(Non-Election Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)
(Non-Election Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

- ☐ Primary (12P) ☒ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

MM / DD / YYYY
11 / 06 / 2018in the
State of

FL

(d) 30-Day
POST-Election
Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

MM / DD / YYYY

in the
State of

5. Covering Period

MM / DD / YYYY
10 / 01 / 2018

through

MM / DD / YYYY
10 / 17 / 2018

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Mead, Arthur, Mr.,

Type or Print Name of Treasurer

Signature of Treasurer

Mead, Arthur, Mr.,

[Electronically Filed]

Date

MM / DD / YYYY
10 / 29 / 2018

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only**FEC FORM 3X**
Rev. 05/2016

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

Crowley Maritime Corporation Federal PAC

Report Covering the Period:

From:

MM	DD	YYYY
10	01	2018

To:

MM	DD	YYYY
10	17	2018

	COLUMN A This Period	COLUMN B Calendar Year-to-Date		
6. (a) Cash on Hand January 1, <table><tr><td>Y Y Y Y</td></tr><tr><td>2018</td></tr></table>	Y Y Y Y	2018		89422.71
Y Y Y Y				
2018				
(b) Cash on Hand at Beginning of Reporting Period.....	71807.29			
(c) Total Receipts (from Line 19)	0.00	86292.08		
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	71807.29	175714.79		
7. Total Disbursements (from Line 31)	9061.16	112968.66		
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	62746.13	62746.13		
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00			
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00			



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
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Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

Crowley Maritime Corporation Federal PAC

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y
10			01			2018			

To:

M	M	/	D	D	/	Y	Y	Y	Y
10			17			2018			

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	0.00	70468.94
(ii) Unitemized	0.00	13323.14
(ii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	0.00	83792.08
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)	0.00	83792.08
12. Transfers From Affiliated/Other Party Committees	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	2500.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))	0.00	86292.08
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	0.00	86292.08

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	0.00	83792.08
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	83792.08
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	61.16	701.74
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	61.16	701.74



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 2019

Daniel L. Warner, in official capacity as Treasurer
Crowley Maritime Corporation Federal PAC
9487 Regency Square Blvd.
Jacksonville, FL 32225

C00147231
AF#: 3489, 3547, 3552

Dear Mr. Warner:

On November 6, 2018, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Crowley Maritime Corporation Federal PAC and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 September Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$667 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 7, 2018, the Commission found RTB that respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 October Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 12, 2018, the Commission found RTB that respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Pre-General Report. The Commission also made a preliminary determination that the civil money penalty was \$800 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess a civil money penalty in AF# 3489, AF# 3547, and AF# 3552. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 1050 First Street, NE, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review

RECEIVED
ELECTION COMMISSION

2019 APR -2 PM 1:26



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

April 2, 2019

MEMORANDUM

To: The Commission

Through: Alec Palmer *AP by BAH*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3489, AF# 3547, and AF# 3552 –
Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official
capacity as Treasurer (C00147231)

On November 6, 2018, the Commission found reason to believe ("RTB") in AF# 3489 that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 September Monthly Report and made a preliminary determination that the civil money penalty was \$667 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 7, 2018, the Commission found RTB in AF# 3547 that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 October Monthly Report and made a preliminary determination that the civil money penalty was \$1,866 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 12, 2018, the Commission found RTB in AF# 3552 that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Pre-General Report and made a preliminary determination that the civil money penalty was \$800 based on the schedule of penalties at 11 C.F.R. § 111.43.

On December 18, 2018 and January 31, 2019, the Commission received their written responses ("challenges"). After reviewing the challenges, the Reviewing Officer Recommendation ("ROR") dated February 14, 2019 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination in AF# 3489 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667; make a final determination in AF# 3547 that the respondents violated 52 U.S.C. § 30104(a) and assess a

civil money penalty of \$1,866; and make a final determination in AF# 3552 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On April 2, 2019, the respondents indicated they did not intend to submit a response.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 3489 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 3489 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667;
- (3) Adopt the Reviewing Officer recommendation for AF# 3547 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (4) Make a final determination in AF# 3547 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$1,866;
- (5) Adopt the Reviewing Officer recommendation for AF# 3552 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination;
- (6) Make a final determination in AF# 3552 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800; and
- (7) Send the appropriate letters.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AFs 3489, 3547 and 3552
Final Determination Recommendation:)
Crowley Maritime Corporation Federal)
PAC and Daniel L. Warner, in his official)
capacity as Treasurer (C00147231))

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election
Commission, do hereby certify that on April 11, 2019, the Commission decided
by a vote of 4-0 to take the following actions in AFs 3489, 3547, and 3552:

1. Adopt the Reviewing Officer recommendation for AF# 3489 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 3489 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$667.
3. Adopt the Reviewing Officer recommendation for AF# 3547 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination.
4. Make a final determination in AF# 3547 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$1,866.

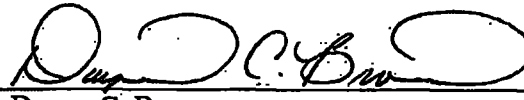
Federal Election Commission
AFs 3489, 3547, 3552
April 11, 2019

5. Adopt the Reviewing Officer recommendation for AF# 3552 involving Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, in making the final determination.
6. Make a final determination in AF# 3552 that Crowley Maritime Corporation Federal PAC and Daniel L. Warner, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$800.
7. Send the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

April 11, 2019
Date


Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 16, 2019

Daniel L. Warner, in official capacity as Treasurer
Crowley Maritime Corporation Federal PAC
9487 Regency Square Blvd.
Jacksonville, FL 32225

C00147231
AF# 3489

Dear Mr. Warner:

On November 6, 2018, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Crowley Maritime Corporation Federal PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2018 September Monthly Report. By letter dated November 6, 2018, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$667 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On December 18, 2018, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Crowley Maritime Corporation Federal PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assess a civil money penalty in the amount of \$667 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on February 14, 2019.

On April 11, 2019, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Crowley Maritime Corporation Federal PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$667. A copy of the Final Determination Recommendation is attached.

At this juncture, the following courses of action are available to you:

1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during

the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

5. Settlement Offers

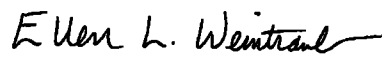
Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not

constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Ellen L. Weintraub
Chair

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$667 for the 2018 September Monthly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form. This penalty may also be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Crowley Maritime Corporation Federal PAC

FEC ID#: C00147231

AF#: 3489

PAYMENT AMOUNT DUE: \$667

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